

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	Chapter 11
BRAZOS ELECTRIC POWER COOPERATIVE, INC.,	Case No. 21-30725 (DRJ)
Debtor. ¹	
BRAZOS ELECTRIC POWER COOPERATIVE, INC.,	
Plaintiff,	Adv. Proc. No. 21-03863 (DRJ)
v.	
ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.,	
Defendant.	

**THE AD HOC GROUP OF
MEMBER-OWNER DISTRIBUTION COOPERATIVES'
WITNESS AND EXHIBIT LIST FOR OCTOBER 18, 2021 HEARING**

Each individual member of the Ad Hoc Group of member-owner distribution cooperatives (each, a “*Co-Op Member*”)² files this Witness and Exhibit List for the matters originally scheduled for **October 18, 2021 at 2:00 p.m. (prevailing Central Time)**, as rescheduled by the *Notice of Reset Hearing Time for Telephonic and Video Hearing on October 18, 2021* [Adv. Dkt. No. 79] to **October 18, 2021 at 12:00 p.m. (prevailing Central Time)** (or as such hearing may be

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is: Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor’s claims and noticing agent at <http://cases.stretto.com/Brazos>. The Debtor’s address is 7616 Bagby Avenue, Waco, TX 76712.

² The Co-Op Members comprising the “*Ad Hoc Group*” are: (1) Bartlett Electric Cooperative, Inc.; (2) Comanche County Electric Cooperative Association; (3) Cooke County Electric Cooperative Association, Inc. d/b/a PenTex Energy; (4) Hamilton County Electric Cooperative Association; (5) Heart of Texas Electric Cooperative, Inc.; (6) J-A-C Electric Cooperative, Inc.; (7) Navasota Valley Electric Cooperative, Inc.; and (8) Wise Electric Cooperative, Inc.

continued or rescheduled, the “*Hearing*”).

WITNESSES

The Co-Op Members may call any of the following witnesses at the Hearing, whether by proffer, by declaration, or through video or telephonic appearance, or any other means directed by the Court:

1. Any witness called or listed by any other party;
2. Any witness necessary to lay the foundation for the admission of exhibits; and
3. Any rebuttal and/or impeachment witnesses.

EXHIBITS

The Co-Op Members may offer into evidence any one or more of the following exhibits at the Hearing:

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
A.	Any motions, pleadings, or other documents filed in these chapter 11 cases					
B.	Any exhibits needed to rebut the testimony of witnesses or evidence presented by any other party					
C.	Any exhibit designated by any other party					

The Co-Op Members reserve the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing.

Dated: October 14, 2021

Respectfully submitted,

/s/ Harry A. Perrin

Harry A. Perrin (Texas Bar No. 15796800)

Michael A. Garza

(S.D. Tex. Fed. I.D. No. 3174861)

Kiran Vakamudi (Texas Bar No. 24106540)

VINSON & ELKINS LLP

1001 Fannin Street, Suite 2500

Houston, Texas 77002

Tel: (713) 758-2222

Fax: (713) 758-2346

hperrin@velaw.com

mgarza@velaw.com

kvakamudi@velaw.com

-and-

Jordan W. Leu (Texas Bar No. 24070139)

VINSON & ELKINS LLP

2001 Ross Avenue, Suite 3900

Dallas, Texas 75201

Tel: (214) 220-7700

Fax: (214) 220-7716

jleu@velaw.com

**COUNSEL FOR THE AD HOC GROUP OF
MEMBER-OWNER DISTRIBUTION
COOPERATIVES**

CERTIFICATE OF SERVICE

I certify that on October 14, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Harry A. Perrin
Harry A. Perrin